

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

TEAL HEREK, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CIRCLE 2, INC. dba DADDY RABBITS, a
Virginia Corporation; WILLIAM PYLIARIS,
an individual; ANDREAS PYLIARIS, an
individual; and DOES 1 through 10, inclusive,

Defendants.

) **Case No.: 3:20-cv-00058-HEH**

)

)

)

**PLAINTIFF'S NOTICE OF CONSENT
TO SUE FORM FOR SONYA HARRIS**

)

)

)

)

)

)

)

)

)

)

)

)

COMES NOW plaintiff Teal Herek (“Plaintiff”), named plaintiff herein, by and through her undersigned counsel, and hereby gives notice of the attached “Consent to Sue” form with respect to the following person:

- Sonya Harris

Dated: March 6, 2020

/s/ Suzanne S. Long
Suzanne S. Long
Virginia Bar No. 46462
David A.C. Long
Virginia Bar No. 51057
MEYER BALDWIN LONG & MOORE LLP
5600 Grove Avenue
Richmond, Virginia 23226
Telephone: (804) 285-3888
Fax: (804) 285-7779
slong@meyerbaldwin.com
davidaclong@gmail.com

John P. Kristensen
California Bar No. 224132
KRISTENSEN LLP
12540 Beatrice Street, Suite 200
Los Angeles, California 90066
Telephone: (310) 507-7924
Fax: (310) 507-7906
john@kristensenlaw.com
(Pro Hac Vice)

Jarrett L. Ellzey
Texas Bar No. 24040864
HUGHES ELLZEY, LLP
1105 Milford Street
Houston, Texas 77066
Telephone: (713) 554-2377
Fax: (888) 995-3335
jarrett@hughesellzey.com
(Pro Hac Vice forthcoming)
Attorneys for Plaintiff



John P. Kristensen
Jesenia A. Martinez
Jacob J. Ventura

CONSENT FORM FOR WAGE CLAIM

Printed Name: Sonya Harris

TEAL HEREK vs Circle 2, Inc. dba DADDY RABBITS, a Virginia Corporation;
WILLIAM PYLIARIS, an individual; ANDREAS PYLIARIS, and individual; and DOES 1
through 10, inclusive,

Eastern District of Virginia Case No. 3:20-cv-00058

1. I consent and agree to be represented by Kristensen LLP or Hughes Ellzey, LLP or David A.C Long, Esq., to pursue my claims of unpaid overtime and/or minimum wage and/or improper Tip Pooling through the lawsuit filed against my employer under the Fair Labor Standards Act and/or applicable state laws.


2. I intend to pursue my claim individually, unless and until the court certifies this case as a collective or class action. I agree to serve as the class representative if the court approves. If someone else serves as the class representative, then I designate the class representatives as my agents to make decisions on my behalf concerning the litigation, the method and manner of conducting the litigation, the entering of an agreement with the plaintiffs' counsel concerning attorney's fees and costs, and all other matters pertaining to this lawsuit.

3. To the best of my knowledge. I meet the following criteria: I worked for Daddy Rabbits as a dancer at some point between January 31, 2017 and the present.



John P. Kristensen
Jesenia A. Martinez
Jacob J. Ventura

4. If my consent form is stricken or if I am for any reason not allowed to participate in this case, I authorize Plaintiffs' counsel to use this Consent Form to re-file my claims in a separate or related action against my employer.

(Signature)  (Date Signed) 3/4/2020
Sonya Harris